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Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Catherine M. Bivens-Beatty,
Plaintiff,
vs.
Backgroundchecks.com, LLC
Defendant

Case No. 2:21-cv-00018-GMN-EJY

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING**

[FIRST REQUEST]

Plaintiff CATHERINE M. BIVENS-BEATTY (“Plaintiff”) and Defendant BACKGROUNDCHECKS.COM LLC (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Defendant to file a responsive pleading from the current deadline of January 28, 2021, up to and including **March 1, 2021**.

The requested extension is necessary in light of the fact that Defendant's counsel was recently retained. The additional time will allow defense counsel to conduct a complete investigation into the allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3 Dated: January 14, 2021

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4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Michael Kind
MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson
DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

8 GEORGE HAINES, ESQ.
9 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

10 Attorneys for Plaintiff
11 CATHERINE M. BIVENS-BEATTY

12 **IT IS SO ORDERED.**

13 Dated: Jan. 15, 2021

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16 ELAYNA J. YOUCAH
17 UNITED STATES MAGISTRATE JUDGE

18 4824-4057-7751.1 107811.1000